



Kristen Schlemmer <kristen@bayoucitywaterkeeper.org>

Bayou City Waterkeepers v City of Houston - Stay of Discovery

Kristen Schlemmer <kristen@bayoucitywaterkeeper.org> Fri, Jan 31, 2020 at 1:38 PM

To: David George <DGeorge@bakerwotring.com>

Cc: "dof@lf-lawfirm.com" <dof@lf-lawfirm.com>, "lauren@lf-lawfirm.com" <lauren@lf-lawfirm.com>, "eallmon@lf-lawfirm.com" <eallmon@lf-lawfirm.com>, Debra Baker <DBaker@bakerwotring.com>

Since we can't agree that the stay should lift when the settlement is final and haven't heard any reason why it shouldn't lift then, we're opposed. Thanks.



Kristen Schlemmer

Legal Director

Bayou City Waterkeeper

she / her / hers

713-714-8442 | 512-619-1583

On Fri, Jan 31, 2020 at 11:36 AM David George <DGeorge@bakerwotring.com> wrote:

I have made revisions to your proposed order. We would like to keep the stay until April 30, 2020. We don't want the provision requiring the City to notify the Court within 3 days. BCW has intervened in the United States' lawsuit, so it will receive notice of any orders or filings.

Please let me know if you're okay with these changes. Otherwise, we will mark BCW as opposed and file the motion with the attached proposed order.

David George
Baker · Wotring LLP
700 JPMorgan Chase Tower
600 Travis Street
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713.980.6513 Direct
713.857.2280 Cell
713.980.1700 Main
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dgeorge@bakerwotring.com
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Board Certified-Civil Appellate Law
Texas Board of Legal Specialization

From: Kristen Schlemmer <kristen@bayoucitywaterkeeper.org>

Sent: Friday, January 31, 2020 10:45 AM

To: David George <DGeorge@BakerWotring.com>

Cc: dof@lf-lawfirm.com <dof@lf-lawfirm.com>; lauren@lf-lawfirm.com <lauren@lf-lawfirm.com>;
eallmon@lf-lawfirm.com <eallmon@lf-lawfirm.com>; Debra Baker <DBaker@BakerWotring.com>

Subject: Re: Bayou City Waterkeepers v City of Houston - Stay of Discovery

David, I did not send you our final draft of the proposed order. We do not give consent based on the last proposed order. The language on the attached order has our approval. Thanks.



Kristen Schlemmer

Legal Director

Bayou City Waterkeeper

she / her / hers

713-714-8442 | 512-619-1583

On Fri, Jan 31, 2020 at 10:30 AM Kristen Schlemmer <kristen@bayoucitywaterkeeper.org> wrote:

After incorporating these edits to the proposed order, you can mark us as unopposed. Thanks.



Kristen Schlemmer

Legal Director

Bayou City Waterkeeper

she / her / hers

713-714-8442 | 512-619-1583

On Fri, Jan 31, 2020 at 9:58 AM David George <DGeorge@bakerwotring.com> wrote:

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From: Kristen Schlemmer <kristen@bayoucitywaterkeeper.org>

Sent: Friday, January 31, 2020 9:47 AM

To: David George <DGeorge@BakerWotring.com>

Cc: dof@lf-lawfirm.com <dof@lf-lawfirm.com>; lauren@lf-lawfirm.com <lauren@lf-lawfirm.com>;
eallmon@lf-lawfirm.com <eallmon@lf-lawfirm.com>; Debra Baker <DBaker@BakerWotring.com>

Subject: Re: Bayou City Waterkeepers v City of Houston - Stay of Discovery

Could you send the proposed order, too? Also, yesterday you asked for 60 days - could you let me know why you need more time than that? Feel free to call if that's quicker. I'm on my cell - 512-619-1583.

Thanks!



Kristen Schlemmer

Legal Director

Bayou City Waterkeeper

she / her / hers

713-714-8442 | 512-619-1583

On Fri, Jan 31, 2020 at 8:09 AM David George <DGeorge@bakerwotring.com> wrote:

The draft motion to stay is attached. It requests a 3-month extension, which is the same period as before.

Please let me know if I can put BCW down as unopposed.

Thanks!

David George
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From: Kristen Schlemmer <kristen@bayoucitywaterkeeper.org>

Sent: Thursday, January 30, 2020 3:57 PM

To: David George <DGeorge@BakerWotring.com>

Cc: dof@lf-lawfirm.com <dof@lf-lawfirm.com>; lauren@lf-lawfirm.com <lauren@lf-lawfirm.com>; eallmon@lf-lawfirm.com <eallmon@lf-lawfirm.com>; Debra Baker <DBaker@BakerWotring.com>

Subject: Re: Bayou City Waterkeepers v City of Houston - Stay of Discovery

Please send the draft order for our review. Thanks.



Kristen Schlemmer

Legal Director

Bayou City Waterkeeper

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On Thu, Jan 30, 2020 at 11:49 AM David George
<DGeorge@bakerwotring.com> wrote:

It will be similar to the last one we filed.

Can I put you down as unopposed?

From: Kristen Schlemmer [mailto:kristen@bayoucitywaterkeeper.org]

Sent: Thursday, January 30, 2020 11:46 AM

To: David George <DGeorge@BakerWotring.com>

Cc: dof@lf-lawfirm.com; lauren@lf-lawfirm.com; eallmon@lf-lawfirm.com; Debra Baker
<DBaker@BakerWotring.com>

Subject: Re: Bayou City Waterkeepers v City of Houston - Stay of Discovery

David, could you send a draft of the motion and proposed order? I don't anticipate having any major changes, but I'd still like to have the opportunity to give feedback as needed.

Thanks.



Kristen Schlemmer

Legal Director

Bayou City Waterkeeper

she / her / hers

713-714-8442 | 512-619-1583

On Thu, Jan 30, 2020 at 8:39 AM David George
<DGeorge@bakerwotring.com> wrote:

The discovery stay is about to expire. The United States and Texas are still completing their review of the comments to the settlement.

The City plans to file a motion to extend the stay another 60 days. I wanted to see if you agreed to that motion.

Thanks.

David George

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